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Proposed Co-Counsel to the Debtors and Debtors in Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

PAPER SOURCE, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 21-30660 (KLP)
)

) (Joint Administration Requested)
)

**PROPOSED FIRST DAY AGENDA FOR MATTERS SCHEDULED
FOR HEARING ON MARCH 3, 2021 AT 3:00 P.M. (PREVAILING EASTERN TIME)**

I. INTRODUCTION

1. “First Day Declaration.” *Declaration of Ronald Kruczynski, Chief Financial Officer of Paper Source, Inc., in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 4]

II. MOTION TO EXPEDITE AND JOINT ADMINISTRATION

2. “Motion for Expedited First Day Hearing.” *Debtors’ Motion for Entry of an Order (A) Setting an Expedited Hearing on First Day Motions and (B) Granting Related Relief* [Docket No. ●]
3. “Joint Administration.” *Debtors’ Motion for Entry of an Order (A) Directing Joint Administration of Chapter 11 Cases and (B) Granting Related Relief* [Docket No. 3]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Pine Holdings, Inc. (4460) and Paper Source, Inc. (8035). The Debtors’ service address is 125 South Clark St., Chicago, IL 60603.

III. FINANCING AND WAGES MOTIONS

4. “DIP & Cash Collateral Motion.” *Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Authorizing the Debtors to Use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Granting Adequate Protection to the Prepetition Secured Parties, (E) Modifying the Automatic Stay, (F) Scheduling a Final Hearing, and (G) Granting Related Relief* [Docket No. 5]
 - a. Declaration in Support of DIP Financing.” *Declaration of Colin M. Adams in Support of Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Authorizing the Debtors to Use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Granting Adequate Protection to the Prepetition Secured Parties, (E) Modifying the Automatic Stay, (F) Scheduling a Final Hearing, and (G) Granting Related Relief* [Docket No. 6]
5. “Wages Motion.” *Debtors’ Motion for Entry of Interim and Final Orders: (A) Authorizing the Debtors to (I) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses, (II) Continue Employee Benefits Programs, and (III) Pay Prepetition Withholdings and Payroll-Related Taxes; and (B) Granting Related Relief* [Docket No. 15]

IV. SALE AND BIDDING PROCEDURES

6. “Sale and Bidding Procedures Motion.” *Debtors’ Motion for Entry of Orders (A) Approving Sale of Substantially All of the Debtors’ Assets, and (B) (I) Approving Bidding Procedures in Connection Therewith, (II) Scheduling a Sale Hearing, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases, and (V) Granting Related Relief* [Docket No. 25]

V. OPERATIONAL MOTIONS

7. “Cash Management Motion.” *Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to (I) Continue to Operate Their Cash Management System, (II) Honor Certain Prepetition Obligations Related Thereto, and (III) Maintain Existing Business Forms and (B) Granting Related Relief* [Docket No. 9]

8. “Critical Vendors Motion.” Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Pay Certain Prepetition Claims of Critical Vendors and (B) Granting Related Relief [Docket No. 12]
9. “Customer Programs Motion.” Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (B) Granting Related Relief [Docket No. 11]
10. “Lienholder Claims Motion.” Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing Payment of Prepetition Common Carrier, Warehouse, and Lienholder Claims and Related Obligations and (B) Granting Related Relief [Docket No. 13]
11. “Lease Rejection Motion.” Debtors’ Motion for Entry an Order (A) Authorizing (I) the Rejection of Certain Unexpired Leases, (II) Abandonment of Any Personal Property, Effective as of the Petition Date, and (B) Granting Related Relief [Docket No. 14]
12. “Insurance Motion.” Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to (I) Maintain, Renew, or Supplement Their Insurance Policies, (II) Continue Their Insurance Premium Financing Agreement, (III) Maintain, Renew, or Supplement Their Surety Bonds, and (B) Granting Related Relief [Docket No. 16]
13. “Taxes Motion.” Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (B) Granting Related Relief [Docket No. 17]
14. “Utilities Motion.” Debtors’ Motion for Entry of Interim and Final Orders (A) Prohibiting Utility Companies from Altering or Discontinuing Services, (B) Providing Utility Companies with Adequate Assurance of Payment, (C) Establishing Procedures for Resolving Requests for Additional Assurance of Payment, and (D) Granting Related Relief [Docket No. 10]

VI. ADMINISTRATIVE MOTIONS

15. “Case Management Motion.” Debtors’ Motion for Entry of an Order (A) Establishing Certain Notice, Case Management, and Administrative Procedures and (B) Granting Related Relief [Docket No. 8]
16. “Schedules and Statements Motion.” Debtors’ Motion for Entry of an Order (A) Extending Time to File Schedules and Statements of Financial Affairs, (B) Authorizing the Debtors to File a Consolidated List of Creditors in lieu of Submitting a Separate Mailing Matrix for Each Debtor, (C) Authorizing

the Debtors to File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors, (D) Authorizing the Debtors to Redact Certain Personal Identification Information, and (E) Granting Related Relief
[Docket No. 7]

17. "Claims and Noticing Agent Retention Application." *Debtors' Application for Entry of an Order Pursuant to 28 U.S.C. § 156(c) (A) Approving the Retention and Appointment of Epiq Corporate Restructuring, LLC as the Claims and Noticing Agent to the Debtors and (B) Granting Related Relief*
[Docket No. 18]

Dated: March 2, 2021
Richmond, Virginia

/s/ David W. Gaffey

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